HOME BUILDERS ASSOCIATION OF CONNECTICUT, INC.
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Your Home Is Our Business

March 8, 2012

To: Senator John Fonfara, Co-Chairman
Representative Vickie Nardello, Co-Chairman
Members of the Energy & Technology Committee

From: Bill Ethier, Chief Executive Officer

Re: Senate Bill 450, AAC Energy Retrofits for Certain Buildings and the Disclosure of the Energy Efficiency of Certain Buildings

Position: **Oppose section 6 and section 22 of SB 450.**

The HBA of Connecticut is a professional trade association with almost 1,000 member firms statewide, employing tens of thousands of Connecticut citizens. Our members, all small businesses, are residential and commercial builders, land developers, home improvement contractors, trade contractors, suppliers and those businesses and professionals that provide services to our diverse industry. Our members build 70% to 80% of all new homes and apartments in the state each year and are involved in countless home improvement projects.

We created and run the HBACT Green Homes Council and work to promote green home construction standards and building practices, including energy efficiency practices, pursuant to the NGBS, the only ANSI-approved green building standard. See our web site and click on the Build Green Connecticut logo on the home page. **However, we support green building and the efficient use of our energy resources with an eye always on reason and practicality.**

Section 6 amends the new home construction contractor (NHCC) registration act by requiring NHCC to inform their customers "of the availability of any state or federal incentives for installing energy efficient options" in a new home. While this sounds simple enough on its face, unfortunately, that information is difficult for researchers to find and be accurate, let alone builders. And, the information about energy efficiency incentives is constantly changing. Home builders, almost all of whom are very small businesses, will not be able to accurately comply with this new business mandate.

Also, the emphasis on improving the energy efficiency of new homes is misplaced for two reasons. New construction is constantly being improved by the code adoption cycle. The 2009 IECC (International Energy Conservation Code) was adopted last year and became effective in CT on Oct. 7, 2011. More importantly, any increase in energy efficiency that goes above code that a consumer might choose will have an insignificant, at best, impact on the total greenhouse gas emission reduction targets in the state. Greenhouse gas emissions include emissions from autos and other transportation facilities, from all existing buildings, from all industrial and commercial operations, as well as all other human activities. The contribution to CO2 emissions from all existing residential

uses amounts to 21.1%.[1] And, of all residential uses, most of the CO2 emissions come from single family and multifamily housing built prior to 1991. All housing built between 1991 and 2001 contributed 2.5% of the total fossil fuel consumption in the nation, which can be roughly correlated to contributions toward CO2 emissions.

Energy consumption in homes has steadily and significantly been decreasing over time. The average energy consumption per home (in California where this study was conducted) has steadily decreased with each decade.

- Homes built in the 1970s had an average energy consumption of over 160 kBTU/sqft-year, while
- the average for all homes built in the 1980s was 80 kBTU/sqft-year,
- in the 1990s was just over 60 kBTU/sqft-year, and
- the 2000s has been 40 kBTU/sqft-year.

Energy consumption by new housing that will be built under the 2009 IECC is, of course, unknown but it will clearly be improved over the housing built in the 2000s and will be much less than the 2.5% of all fossil fuel consumption experienced by housing built between 1991 and 2001. Moreover, the effects of occupant behavior on energy consumption can be significant regardless of the statutory or building code requirement or incentive-based upgrades a consumer chooses, which would defeat any of the already marginal gains in energy efficiency sought by the proposed legislation. **Therefore, please do not place an unnecessary and additional demand on home builders and delete section 6 from SB 450.**

Section 22 is identical to section 1, SB 1168 of the 2011 regular session, which did not pass. Among other things, it mandates the State Building Code be amended to require that "all residential and certain commercial construction" "have the capacity to support" "an electric vehicle infrastructure to support any make, model or type of electric vehicle." **Aside from the vagueness and confusion of this language, we question why all such new buildings need to be constructed in a way to satisfy a fraction of one percent of the population that drives an electric vehicle, especially when such drivers can always opt to upgrade their homes to "plug in."** Moreover, since technology is constantly changing, requiring all new buildings to be wired to meet today's electric vehicle needs is extremely wasteful because it is very likely to be outdated and useless for tomorrow's electric vehicle needs. Read another way, the language of section 22 is unnecessary because the "capacity" already exists in the sense that any 200 amp or greater home electric service panel can be wired with a 40 amp, 240v circuit by an electrician. And, the 2011 National Electric Code (NEC) that is going to be adopted later this year or next year in CT (as part of our State Building Code) has provisions for electric vehicle hookups. **Therefore, we urge you to not adopt section 22 in SB 450 and leave these electric infrastructure upgrades as an option for building owners, how they need it and when they need it.**

Please do not support section 6 or section 22 of SB 450. Thank you for considering our comments on this legislation.

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[1] Industrial uses comprise 30%, transportation 31.2% and commercial uses 17.7% of all CO2 emissions.